

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	
)	CRIMINAL NO. 21-CR-30028-MGM
BENJAMIN SHACAR,)	
)	
)	
Defendant.)	
)	
)	

DEFENDANT’S MOTION TO CONTINUE STATUS CONFERENCE (ASSENTED TO)

Now comes the defendant, Benjamin Shacar, who moves this Honorable Court, for an order continuing the status conference in this case which is scheduled for August 15, 2023 to a date after September 13, 2023.

As grounds therefore, counsel for the defendant states that the case was originally scheduled for a status conference on August 9, 2023 and then continued by the Court to the presently scheduled date of August 15, 2023. Counsel will be out of the district and unavailable to attend the rescheduled hearing on that date.

In addition to the above, counsel for the defendant states that this case was reassigned to him in March 2023. Counsel has completed his review of the significant amount of discovery materials in this case and anticipates the filing of additional discovery requests. Counsel is presently reviewing materials from other cases from this district and other districts related to search and seizure issues which may lead to the filing of a motion to suppress. In addition, counsel and the assistant United States Attorney have communicated about discovery previously provided to predecessor and additional discovery the defendant wishes to pursue in order to

prepare a motion to suppress in this case. The assistant United States attorney indicated that he is about to start a trial and will require additional time by which to respond to discovery requests.

Counsel seeks a continuance in order to complete his review of the discovery materials and request additional discovery materials in the case and those materials related to the filing of a motion to suppress as well as to conduct his own research on the search and seizure issues related to this case.

The assistant United States attorney assigned to this case assents to the allowance of this motion.

Respectfully submitted,

BENJAMIN SHACAR

/s/ William J. O'Neil

WILLIAM J. O'NEIL

Attorney for the Defendant

280 North Main Street, Suite 6

East Longmeadow, MA 01028

(413) 224-2694

BBO#:548445

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

August 10, 2023

/s/ William J. O'Neil

William J. O'Neil